



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 16, 2021

BY ECF and E-MAIL

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York, 10007

Application granted. The S3 Indictment is
unsealed.

SO ORDERED.

Dated: 6/22/2021

P. Kevin Castel
United States District Judge

Re: United States v. Guillermo Perez, S3 19 Cr. 781 (PKC)

Dear Judge Castel:

On June 3, 2021, the Grand Jury issued the above referenced two-count Indictment, charging Guillermo Perez with one count of conspiracy to commit wire fraud and bank fraud, in violation of Title 18, United States Code, Section 1349, and one count of conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h). Perez was arrested in Houston, Texas on June 9, 2021, and presented in the Southern District of Texas the following day. The Government writes respectfully to request that (1) the Court unseal the above-referenced Indictment, S3 19 Cr. 781 (PKC); (2) schedule an initial pretrial conference; and (3) exclude time between today and the date of the initial pretrial conference.


The Government respectfully requests that the Court schedule the initial pretrial conference for Tuesday, June 22, 2021 at 12:00 pm, which we believe is a time that is convenient for the Court based on our correspondence with Your Honor's deputy clerk. In addition, because the defendant and his counsel both reside in Texas, we respectfully request that the initial conference be conducted by videoconference or telephone conference.

The Government further requests, with the consent of defense counsel, that the Court exclude time between today and the date the Court schedules the initial conference, pursuant to 18 U.S.C. § 3161(h)(7). The Government submits that the ends of justice served by the exclusion outweigh the best interest of the public and the defendant in a speedy trial, as that time will permit

the Government to collect and prepare discovery for production.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: 

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